

**UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION**

TOCARRA HOLLINSHEAD,	)	C.A. No.: 2:19-cv-02517-RMG-BM
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
THE MEDICAL UNIVERSITY OF	)	<b>JOINT MOTION FOR SECOND</b>
SOUTH CAROLINA,	)	<b>EXTENSION OF TIME FOR</b>
	)	<b>DEFENDANT TO FILE</b>
Defendant.	)	<b>ANSWER</b>
	)	

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Pursuant to Local Civil Rule 6.01, the parties jointly move this Honorable Court for an order again extending the time for Defendant to file an answer in response to Plaintiff's Complaint. The parties request the Court extend the deadline for Defendant to file an answer so the parties can engage in an early mediation. The current deadline for Defendant to file an answer, or otherwise respond to Plaintiff's Complaint, is Friday, December 20, 2019, pursuant to the Court's prior Order of November 5, 2019 (ECF Doc. 12). The parties request the Court extend the deadline until Friday, January 17, 2020.

The parties request the second extension of the deadline for Defendant to file its Answer because the parties, including the representative for Defendant's insurance carrier and Defendant's general counsel, agreed to participate in an early mediation of this case with David McCormack, Esquire, on Friday, December 13, 2019. However, several days prior to the scheduled mediation, Defendant's general counsel, who was scheduled to attend the mediation, had a death in her immediate family and was unable to attend mediation. Because Defendant's general counsel's appearance is necessary to mediation, the mediation was rescheduled.

The parties, including the representative for Defendant's insurance carrier and Defendant's general counsel, confirmed their availability to mediate this case on Tuesday, January 14, 2020. Further, the mediator, David McCormack, is available and re-scheduled the mediation for Tuesday, January 14, 2020.

In accordance with Local Rule 7.04, no memorandum of law is filed herewith as such document would serve no useful purpose.

s/ Bob J. Conley

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ATTORNEYS FOR DEFENDANT

s/ Thomas J. Rode

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Charleston, South Carolina  
December 17, 2019